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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

BLENDTEC INC. , a Utah corporation, Plaintiff, vs. BLENDJET INC. , a Delaware corporation, Defendant.	BLENDJET’S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL Civil No. 2:21-cv-00668-TC-DBP Judge Tena Campbell Magistrate Judge Dustin B. Pead
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Defendant BlendJet, Inc., pursuant to DUCivR 5-3 and the Standard Protective Order that applies in all civil cases in the U.S. District Court for the District of Utah, hereby moves this Court

for leave to file under seal complete – or in some cases unredacted – versions of the following documents:

- BlendJet’s Response to Blendtec’s Motion to Enforce the Protective Order, to Disqualify Patrick McGill and Sheppard Mullin, and for Attorneys’ Fees;
- Declaration of Martin R. Bader in Support of BlendJet’s Response to Blendtec’s Motion to Enforce the Protective Order, to Disqualify Patrick McGill and Sheppard Mullin, and for Attorneys’ Fees (“Bader Declaration”);
- Declaration of Patrick McGill in Support of BlendJet’s Response to Blendtec’s Motion to Enforce the Protective Order, to Disqualify Patrick McGill and Sheppard Mullin, and for Attorneys’ Fees (“McGill Declaration”);
- Declaration of Ryan Pamplin in Support of BlendJet’s Response to Blendtec’s Motion to Enforce the Protective Order, to Disqualify Patrick McGill and Sheppard Mullin, and for Attorneys’ Fees;
- Declaration of Matthew L. Lalli in Support of BlendJet’s Response to Blendtec’s Motion to Enforce the Protective Order, to Disqualify Patrick McGill and Sheppard Mullin, and for Attorneys’ Fees;
- Exhibit A to Bader Declaration;
- Exhibit E to Bader Declaration;
- Exhibit F to Bader Declaration;
- Exhibit G to Bader Declaration;
- Exhibit L to McGill Declaration;
- Exhibit M to McGill Declaration; and

- Exhibit N to McGill Declaration

Good cause exists to file these documents under seal because they have been designated as CONFIDENTIAL INFORMATION—ATTORNEYS’ EYES ONLY pursuant to the Standard Protective Order by either BlendJet or Blendtec, and therefore contain (or supposedly contain) non-public and sensitive information that, if publicly disclosed, could cause the designating party competitive harm. *See* DUCivR 26-2; DUCivR 5-3(b)(2)(C)(i)].

Accordingly, BlendJet respectfully requests that the Court enter an Order restricting public access to and/or sealing the foregoing documents.

Respectfully submitted this 16th day of May, 2023.

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/s/ Martin R. Bader

Attorneys for Defendant BlendJet, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of May, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an electronic notification to counsel of record for all parties, including the following:

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/s/ Martin R. Bader